

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

GILEAD SCIENCES, INC., et al.,	:	
	:	
Plaintiffs,	:	Case No. 21-cv-4106 (AMD)
	:	(RER)
v.	:	
	:	
SAFE CHAIN SOLUTIONS, LLC, et al.,	:	
	:	
Defendants.	:	

**STIPULATION AND [PROPOSED] ORDER EXTENDING
THE TIME TO ANSWER OR OTHERWISE RESPOND TO
THE CORRECTED FOURTH AMENDED COMPLAINT**

WHEREAS, on July 30, 2022, Plaintiffs Gilead Sciences, Inc., Gilead Sciences Ireland UC, and Gilead Sciences, LLC (together, “Gilead” or “Plaintiffs”) filed their proposed Fourth Amended Complaint naming, *inter alia*, Defendant Alex Gelbinovich (“Gelbinovich”);

WHEREAS, on August 11, 2022, the Court entered the Fourth Amended Complaint (Dkt. No. 626);

WHEREAS, on September 30, 2022, Gilead filed the corrected Fourth Amended Complaint (Dkt. No. 782); and

WHEREAS Gilead and Gelbinovich have agreed to extend Gelbinovich’s time to answer, move, or otherwise respond to the Corrected Fourth Amended Complaint.

NOW THEREFORE, UPON THE STIPULATION AND AGREEMENT by and between the undersigned counsel for Plaintiffs and Gelbinovich, it is hereby ORDERED that:

1. Alex Gelbinovich's time to answer, move, or otherwise respond to the Corrected Fourth Amended Complaint is extended until **November 25, 2022**.
2. Plaintiffs and Gelbinovich do not waive and reserve all rights and remedies not specifically addressed herein.
3. Signatures transmitted electronically or by facsimile shall be deemed original.

Dated: October 25, 2022

Respectfully submitted,

<p><u>/s/ Geoffrey Potter</u> GEOFFREY POTTER TIMOTHY A. WATERS THOMAS P. KURLAND PATTERSON BELKNAP WEBB & TYLER LLP 1133 Avenue of the Americas New York, NY 10036-6710 Tel: (212) 336-2000 Fax: (212) 336-2222 gpotter@pbwt.com twaters@pbwt.com tkurland@pbwt.com <i>Attorneys for Plaintiffs</i></p>	<p><u>/s/ Leo Shalit</u> LEO SHALIT, PC by Leo Shalit, Esq. 565 Plandome Road, #9 Manhasset, New York 11030 (833) 742 - 5481 leo@shalit-law.com <i>Attorney for Defendant Alex Gelbinovich</i></p>
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SO ORDERED

Issued: